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August 2, 2023

VIA ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1305
New York, New York 10007

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited, et al.*,
No. 1:22-cv-02943 (PAE) (S.D.N.Y.)

Dear Judge Engelmayer:

We represent Defendants Wells Fargo Trust Company, N.A., solely in its capacity as Owner Trustee (“Wells Fargo”), and UMB Bank, N.A., solely in its capacity as Owner Trustee (“UMB”, and together with Wells Fargo, “Defendants”), in the above-captioned action. Pursuant to Rule 1.A. of your Honor’s Individual Rules and Practices in Civil Cases, we submit this letter in connection with Defendants’ Motion to Alter or Amend the Court’s July 18, 2023 Order, imposing a preliminary injunction on Defendants, which we filed today. (ECF No. 108.)

Although pursuant to Local Civil Rule 6.1(b), Plaintiff’s response to the motion would not be due until August 16, 2023, we respectfully request that the Court shorten that deadline so that the parties may address this motion at the currently scheduled August 10 hearing date. We respectfully request that Plaintiff file any opposition to Defendants’ motion by August 7, 2023, with any reply filed by 2:00 pm on August 9, 2023.

Respectfully submitted,

/s/ Jed M. Schwartz
Jed M. Schwartz

cc: All Counsel of record (via ECF)

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